1 JEROME SCHREIBSTEIN (SBN 154051) JAMES T. CONLEY (SBN 224174) 2 THE LOUDERBACK LAW FIRM One Embarcadero Center, Suite 2300 3 San Francisco, California 94111 Telephone: (415) 398-7860 4 Facsimile: (415) 398-7863 5 Attorneys for Defendant BAYER HEALTHCARE LLC 6 7 HOWARD MOORE, JR. (SBN 55228) 8 MOORE & MOORE 445 Bellevue Avenue, 2nd Floor 9 Oakland, California 94619 Telephone: (510) 451-0104 10 Facsimile: (510) 451-5056 Attorneys for Plaintiffs 11 DWIGHT L. DOVE 12 13 UNITED STATES DISTRICT COURT 14 NORTHERN DISTRICT OF CALIFORNIA 15 SAN FRANCISCO DIVISION 16 17 DWIGHT DOVE, CASE NO. C-05-02873 JSW Plaintiff, 18 STIPULATION AND /PROPOSED/ ORDER REGARDING DISCOVERY v. 19 **SCHEDULE** 20 BAYER HEALTHCARE, Biological Products Division, a for profit business entity, Judge: Honorable Jeffrey S. White 21 Defendant. 22 Trial Date: None Set. 23 24 25 26 27 28

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1 WHEREAS, the October 28, 2005 Case Management Conference minute order vacated the 2 dates previously set for: (1) close of non-expert discovery, (2) the last day for expert disclosures, 3 and (3) close of expert discovery. 4 WHEREAS, this Court ordered the parties to meet and confer on new dates for the above 5 events: 6 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively 7 adverse, they agree through their respective counsel and stipulate as follows: 8 1. Close of non-expert discovery: February 17, 2006; 9 2. Last day for expert disclosures: March 24, 2006; 10 3. Close of expert discovery: April 24, 2006; 11 IT IS SO STIPULATED. 12 13 MOORE & MOORE DATED: December 1, 2005 14 15 By: __ HOWARD MOORE, JR. 16 Attorney for Plaintiffs LAVON JONES, JR., NATHANIEL WOODS, 17 JR., HABEN BERHANE, and DWIGHT L. 18 DOVE 19 DATED: December 1, 2005 By: 20 CHARLES STEPHEN RALSTON Attorney for Plaintiff 21 **DWIGHT DOVE** 22 23 DATED: December 1, 2005 THE LOUDERBACK LAW FIRM 24 25 By: 26 JEROME SCHREIBSTEIN JAMES T. CONLEY 27 Attorneys for Defendant 28 BAYER HEALTHCARE LLC STIPULATION AND (PROFESSE) ORDER REGARDING DISCOVERY SCHEDULE

CASE NO. C-05-02873 JSW

IT IS SO ORDERED. Dated December 2005 UNITED STATES DISTRICT JUDGE Doc#34985